



February 17, 2000

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USDA/FSIS Hearing Clerk
300 12th Street, S.W., Room 1102
Cotton Annex
Washington, DC 20250-3700

RE: Docket No. 98-045N
Draft Preliminary Food Safety Strategic Plan

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AARP appreciates this opportunity to comment on the Draft Preliminary Food Safety Strategic Plan. We commend the administration for the significant effort invested in the development of the Strategic Plan. Going beyond the earlier version, the current draft of the Plan makes clear that the functional structure proposed is organized around three major goals: Science and Risk Assessment, Risk Management, and Risk Communication.

While we suggest only two recommendations at this time, there are a number of issues regarding other components of the Plan on which we may comment later in the developmental process. Our two recommendations are:

The President's Council on Food Safety should pursue "Option V" of the Plan, which creates a new, consolidated, stand-alone federal food safety agency. Many of the existing problems with the federal government's response to food safety problems stem from -- or, at least, are exacerbated by -- the existence of multiple agencies with overlapping jurisdiction, disparate authority and disproportionate resources. The President's Council has been given the opportunity, in developing the Strategic Plan, to suggest fundamental changes, to think "outside the box" and devise a coherent, comprehensive food safety regulatory system. We believe that a single agency can best assure that inspection and regulation are risk-based, resources are properly allocated, imports are adequately scrutinized, food safety technologies are reviewed expeditiously, and food safety problems do not fall through the cracks.

The Plan's vision statement should speak more directly to the federal role in protecting public health. We do not believe that the language of current opening statement -- "Consumers can be confident that food is safe." -- adequately captures the federal government's role. AARP supports the statement's reference to the needs of vulnerable populations because foodborne illness disproportionately affects older persons, young children, and those with suppressed immune systems. Nevertheless, the opening sentence of the statement omits mention of the vital federal role as part of the vision. The plan is necessary because foodborne illness is a significant public health threat. It is also the product of cooperative dialogue among the federal government regulators responsible for ensuring that the food supply is safe. We suggest adding some federal role language to remedy this oversight in the opening of the vision statement. For example, "A federally coordinated, public health approach to food contamination makes consumers confident that their food supply is safe." While all players -- from **farm** to table -- have a role to play in ensuring food safety, this Plan tells us what the federal government must do.



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The roles already identified include: (1) assess food safety risks; (2) manage food safety risks that have been identified; and (3) inform producers, processors, retailers, and consumers about the sources of these risks, and how to minimize or even eliminate them. We would also add to this list the obvious federal role of regulatory enforcement.

AARP appreciates this opportunity to participate in the development of a more effective food safety system. If you have any questions, please contact Larry White in our Federal Affairs Department at 434-3800.

Sincerely,

A handwritten signature in black ink, appearing to read "Martin Corry". The signature is fluid and cursive, with a long horizontal stroke at the end.

Martin Corry
Director
Federal Affairs